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June 3, 2020

**By ECF**

Honorable Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Centre Street, Room 2202  
New York, New York 10007

Re: *Cassandra Henderson, MD v. Physician Affiliate Group of New York P.C.,  
et al.* 18 CV 03430 (JMF)

Dear Judge Furman:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, attorney for defendants in the above-referenced action. I write, jointly with plaintiff's counsel, to request a 60-day stay of discovery, from June 15, 2020, to August 14, 2020, for the parties to continue on-going settlement discussions. The parties are close to a resolution and need the additional time to finalize the terms of an agreement. Fact discovery presently closes on June 15, 2020. This is the parties' first request for a stay of discovery. The parties' next scheduled appearance before the Court is June 16, 2020 at 3:30pm.

The parties are available for a conference should the Court require additional information in connection with this request.

We appreciate the Court's attention and consideration of this request.

cc: Counsel of Record (By ECF)

Respectfully Submitted,

/s/

Kerrin A. Bowers  
Assistant Corporation Counsel

Application GRANTED in part and DENIED in part. The application to extend the June 15th fact discovery deadline is denied in light of both the Court's February 24, 2020 Order stating that further extension requests were unlikely to be granted and the admonition in the Case Management Plan that discovery and settlement must proceed on parallel tracks. As a courtesy, however, the Court will extend the expert discovery deadline to **July 29, 2020**, so that the parties can focus on settlement before incurring the expenses of expert discovery. The pretrial conference on June 16th remains scheduled as is. The parties should promptly advise the Court if they reach a settlement in principle, in which case it would issue a "60-Day Order" dismissing the case. The Clerk of Court is directed to terminate ECF No. 70. SO ORDERED.

June 4, 2020